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**From:** Pratt, Marirose [Pratt.Marirose@epa.gov]  
**Sent:** 2/28/2022 10:24:47 AM  
**To:** Russo, Todd [Russo.Todd@epa.gov]; Dressler, Jason [Dressler.Jason@epa.gov]; Kler, Denis [Kler.Denis@epa.gov]; Mills, Andrew [mills.andrew@epa.gov]; Taylor, Kevin [Taylor.Kevin@epa.gov]  
**Subject:** FW: Status Update - New-Indy Catawba LLC's Response to EPA Section 114 Information Request

New Indy's responses...

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**From:** Weber, Steven D. <steveweber@parkerpoe.com>  
**Sent:** Friday, February 25, 2022 4:20 PM  
**To:** Pratt, Marirose <Pratt.Marirose@epa.gov>  
**Cc:** Cobery, Jim <JimC@TheKraftGroup.com>; Stephanie Blackman <sblackman@schwarzpartners.com>; Nowell, Valerie <Nowell.Valerie@epa.gov>  
**Subject:** Status Update - New-Indy Catawba LLC's Response to EPA Section 114 Information Request

Marirose:

Below are New-Indy Catawba's responses to your questions regarding the status update on New-Catawba's response to EPA's most recent CAA Section 114 information request. Regarding New-Indy Catawba's timeline for providing information to EPA, Tony Hobson at New-Indy Catawba sent Kevin Taylor a request for extension this afternoon. Thank you.

Steve

1. You state that the date, time, and duration of when the stripper off gases are vented to the atmosphere and not sent to the corresponding air pollution control device is not data that is measured. Can you please explain how New Indy complies with the requirements for the steam stripper bypass in 40 CFR §§ 63.443, 63.450(d), and CFR 63.454 if New Indy does not collect or maintain records of this data?  
New-Indy verifies compliance with the stripper bypass conditions utilizing its Pi system. If there was an SOG venting event, it would be reported on the next day's exceptions report. New-Indy has not had an SOG venting event documented on its daily exceptions report, as shown in its semi-annual compliance reports. New-Indy verified the lack of exceptions by reviewing the records of the existing PI tag for the SOG vent

valve position, which goes back to April 2019. Venting occurs if the steam stripper is operating and a boiler goes down such that a rupture disk or the pressure control valve open before the SOG valve from the steam stripper closes. New-Indy reviewed the trending rupture disk openings along with control valve and steam stripper operation data in Pi to identify whether there were periods in which that occurred. Sixteen periods of venting are shown in Pi from April 2019 to present. Each of those periods was checked against the control valve Pi tag to confirm the control valve was closed when the SOG vent valve was open. There were no periods of time when the SOG vent valve and the control valve were open at the same time, which would reflect bypass of the steam stripper and venting of SOGs to the atmosphere.

2. **Please elaborate on why monthly records of SO<sub>2</sub> emissions are not available. (It is the EPA's understanding that the company maintains records of SO<sub>2</sub> captured by wood ash (daily records) and annual SO<sub>2</sub> emissions (monthly records and 12-month rolling sum records). Combination boiler #1 and combination boiler #2 are emission units that are part of the monthly SO<sub>2</sub> emission calculations).**

New-Indy calculates its monthly SO<sub>2</sub> emissions utilizing the theoretical/permitted SO<sub>2</sub> emissions from combined NCG + SOG combustion in the 2011 Fiberline optimization PSD permit application, which assumes the permitted BACT emissions rate of 10.1 lb SO<sub>2</sub>/ADTUBP. The actual SO<sub>2</sub> emissions rate from the initial compliance test conducted on October 25, 2012 was 6.76 lb SO<sub>2</sub>/ADTUBP, below the permitted rate the mill uses to calculate emissions. The actual SO<sub>2</sub> emissions rate from the October 2012 test includes the SO<sub>2</sub> from bark combustion, NCG combustion and SOG combustion during the test.

3. **Please explain how monthly SO<sub>2</sub> emissions from combination boiler #1 and combination boiler #2 are calculated without knowing the amount of SOGs and NCGs incinerated in the boilers.**

New-Indy uses its permitted BACT emissions factor from burning the combined NCG + SOG (expressed in lb SO<sub>2</sub> per ton of pulp produced) coupled with records of which boiler is incinerating the gases. The mill burns the NCG (LVHC and HVLC streams) and SOG together in one boiler or the other boiler. The amounts of NCG and SOG incinerated in the boilers are not required to complete the calculations using the BACT emissions limit.

4. **Please elaborate on why monthly bleached and unbleached production data is not available prior to January 2007.**

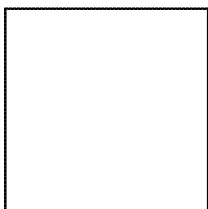
The pulp production data is recorded in the mill's Pi system. The pulp production Pi tags only go back until January of 2007. Data from prior to 2007 is beyond the five-year retention period of the Clean Air Act, is from a period prior to New-Indy Catawba's ownership of the mill, and the mill no longer maintains those records.

5. **Please elaborate on why annual pulping system closed collection system method 21 evaluations, monthly condensate closed collection system inspections, and annual condensate closed collection system method 21 evaluations are not available prior to 2014.**

The mill began contracting with Environmental 360 to complete the required LDAR testing in 2014. Environmental 360 has maintained copies of those reports. Data from prior to 2014 is beyond the five-year retention period of the Clean Air Act, from a period prior to New-Indy Catawba's ownership of the mill, and the mill no longer maintains those records.

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**Steve Weber**  
Partner



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**From:** Pratt, Marirose <Pratt.Marirose@epa.gov>  
**Sent:** Friday, February 18, 2022 11:15 AM  
**To:** Weber, Steven D. <steve.weber@parkerpoe.com>  
**Cc:** Cobery, Jim <JimC@TheKraftGroup.com>; Stephanie Blackman <sblackman@schwarzpartners.com>  
**Subject:** RE: Status Update - New-Indy Catawba LLC's Response to EPA Section 114 Information Request

\*\*\*Caution: External email\*\*\*

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Hi Steve

Thank you for the status update on New Indy's response to EPA's most recent CAA Section 114 request.

My program clients have a few follow up questions regarding the update.

1. You state that the date, time, and duration of when the stripper off gases are vented to the atmosphere and not sent to the corresponding air pollution control device is not data that is measured. Can you please explain how New Indy complies with the requirements for the steam stripper bypass in 40 CFR §§ 63.443, 63.450(d), and CFR 63.454 if New Indy does not collect or maintain records of this data?
2. Please elaborate on why monthly records of SO<sub>2</sub> emissions are not available. (It is the EPA's understanding that the company maintains records of SO<sub>2</sub> captured by wood ash (daily records) and annual SO<sub>2</sub> emissions (monthly records and 12-month rolling sum records). Combination boiler #1 and combination boiler #2 are emission units that are part of the monthly SO<sub>2</sub> emission calculations).
3. Please explain how monthly SO<sub>2</sub> emissions from combination boiler #1 and combination boiler #2 are calculated without knowing the amount of SOGs and NCGs incinerated in the boilers.
4. Please elaborate on why monthly bleach and unbleached production data is not available prior to January 2007.
5. Please elaborate on why annual pulping system closed collection system method 21 evaluations, monthly condensate closed collection system inspections, and annual condensate closed collection system method 21 evaluations are not available prior to 2014.

Your status update did not indicate that New Indy would need additional time to respond to the 114 request. Can you please confirm that New Indy is planning to submit a complete response to the 114 request by the original deadline or do you anticipate requesting an extension?

Regards,  
Marirose

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**From:** Weber, Steven D. <steve.weber@parkerpoe.com>  
**Sent:** Thursday, February 10, 2022 2:57 PM  
**To:** Pratt, Marirose <Pratt.Marirose@epa.gov>; Nowell, Valerie <Nowell.Valerie@epa.gov>  
**Cc:** Cobery, Jim <JimC@TheKraftGroup.com>; Stephanie Blackman <sblackman@schwarzpartners.com>  
**Subject:** Status Update - New-Indy Catawba LLC's Response to EPA Section 114 Information Request

Marirose and Valerie:

Please find attached a status update regarding New-Indy Catawba LLC's response to EPA's Section 114 information request. New-Indy Catawba plans to begin a rolling production next week with the goal of completing production by February 28. Please let us know if you have questions. Thanks.

Steve

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**Steve Weber**  
Partner



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